

04-CR-00494-M

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

RUBIN LUIS SHUMPERT,

Defendant.

NO. CR04-494MJP

MOTION FOR DETENTION ORDER

The United States moves for pretrial detention of defendant, pursuant to
18 U.S.C. § 3142(e) and (f):

1. Eligibility of Case. This case is eligible for a detention order because this
case involves (check all that apply):

- ☐ Crime of violence (18 U.S.C. § 3156).
- ☐ Maximum sentence of life imprisonment or death
- ☐ 10 + year drug offense
- ☐ Felony, with two prior convictions in the above categories
- ☒ Serious risk the defendant will flee
- ☒ Serious risk of obstruction of justice

2. Reason for Detention. The Court should detain defendant because there
are no conditions of release which will reasonably assure (check one or both):

- ☒ Defendant's appearance as required
- ☒ Safety of any other person and the community

1 3. Rebuttable Presumption. The United States will not invoke the rebuttable
2 presumption against defendant under §3142(e). (If yes) The presumption applies
3 because (check one or more):

4 ___ Probable cause to believe defendant committed 10+ year drug offense or
5 firearm offense under 18 U.S.C. § 924(c)

6 ___ Previous conviction for "eligible" offense committed while on pretrial
7 bond

8 4. Time for Detention Hearing. The United States requests the Court conduct
9 the detention hearing:

10 XX At the initial appearance

11 ___ After continuance of 3 days (not more than 3)

12 5. Other matters.

13
14 DATED this 15TH day of April, 2005.

15 Respectfully submitted,
16 JOHN McKAY
17 United States Attorney

18 William H. Redkey, Jr.
19 WILLIAM H. REDKEY, JR.
20 Assistant United States Attorney